

A Case for Continuous Compliance

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CPM Project

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For public colleges and universities institutional accreditation is a must; it is the institution's life blood. Because two-year public institutions of higher learning do not have large endowments that can carry the institution financially, acquiring and maintaining regional accreditation is essential since they depend on their students qualifying for federal financial aid. The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) is "the recognized regional accrediting body in the eleven U.S. Southern states (Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas and Virginia) and in Latin America for those institutions of higher education that award associate, baccalaureate, master's or doctoral degrees," (SACSCOC website, n.d.). On its' website SACSCOC also notes, SACSCOC's institutional accreditation carries the assurance that its "institutions provide quality programs for students which determines eligibility for Title IV funds (student financial aid)," (SACSCOC website, n.d.). After initial accreditation institutions seek reaffirmation every ten years. During the reaffirmation process the two-year higher education institution is required to provide proof of compliance with the 86 relevant principles of accreditation. The institution is also required to complete a Fifth-Year Interim Report where they provide proof of compliance with 24 principles, somewhat of a mini-reaffirmation.

Spartanburg Community College (SCC) is accredited by SACSCOC. During the fall semester of the previous academic year, 89% of SCC students receive some form of financial assistance and 76.6% receive some form of federal financial aid with 45.8% receiving Pell, which is authorized for students classified as low income.

Imagine a college attempting to operate without approximately 39% of its revenue, which would be the case if this college lost its accreditation, as tuition and fees account for approximately one-half of the institution's revenue. SCC was last reaffirmed in 2016. The process of completing the compliance audit began in mid-2013 and was literally completed when it was submitted on March 15, 2015. Most of the research, data collection, writing, and proofing was conducted by a very small team (this team that was not representative of all areas of the college, which was not the ideal). This was a process that should never be repeated. Unfortunately, the same mentality that was demonstrated after the 2006 reaffirmation still exists. The prevailing view is that once reaffirmation is achieved, the institution has nine years before there is a need to be concerned with "getting ready" for the next one.

First and foremost, reaffirmation or proving the institution is in compliance, is not something an institution should have to "get ready" for. It should always be ready because reaffirmation is simply the verification that the institution "has a purpose appropriate to higher education and has resources, programs, and services sufficient to accomplish and sustain that purpose," (SACSCOC website, n.d.).

Data Collection and Analysis

In 2018 SCC began assessing the possibility of offering a Bachelor of Applied Science degree. Currently the College is authorized to offer Associate degrees as its highest award. In order to offer the new degree, the College would need to receive approval for a level change from SACSCOC. As part of the "Application for a Member Institution Seeking Accreditation at a Higher or Lower Degree Level," seventeen principles of accreditation must be addressed. A preliminary review of the institution's

status for each of the required principles indicated thirteen of the seventeen principles would require updating. Of that thirteen, four would be the responsibilities of new unit managers, who had no idea of said responsibility or what was required. This review planted the seed for this idea of continuous compliance. The next step was a review of the College's 2016 reaffirmation compliance packet which revealed that 639 unduplicated documents were provided as supporting documentation for making the case for compliance with the eighty-four (84) accreditations principles required of an institution of higher education that offers only undergraduate level courses and below. Eighty-eight (88) SCC unduplicated policies and procedures were included as supporting documentation to make the case compliance. The review of those policies and procedures showed that:

- Forty-one were up-to-date.
- Thirty-nine needed updating.
- Eight needed to be reviewed to determine if they are viable or no longer needed.

A review of the remaining 551 documents revealed that:

- Sixty-four were up-to-date.
- Three were outdated.
- Two hundred and five require annual updating.
- One hundred and ninety-two status were unknown to me.
- Ninety needed checking to determine if they are viable or no longer needed.

Additionally, the SACSCOC principles of accreditation went through an overhaul in 2018 and though much of the information and documentation needed to make the

case for compliance is the same as the previous version (2012 version), the changes require an overhaul of the narratives and possible combining and/or separation of supporting information and documentation. Also, two new principles were added to the compliance requirements.

Once I knew where we were deficient, my next step was to reach out to colleagues who are responsible for or worked closely with SACSCOC accreditation at their institutions. To not have to reinvent the proverbial wheel, I was hoping to find a process or combination of processes I could emulate or tweak to build the SCC Continuous Compliance Plan/Process. The most relevant results of what I found are as follows:

- Several of my colleagues' institutions depend on their college's policies, procedures, and processes to frame their compliance and plan to begin addressing their audit using the teams format beginning a couple of years prior to their compliance audit submission date.
- One institution has identified those areas responsible for particular principles and those areas have been given the lead-way to determine how to manage the compliance status for their principles. That institution will bring those areas together a couple of years prior to the compliance audit submission date, to complete the audit.
- One college identified its responsible parties, divided the principles into four groups, and they assess one group of principles per year.
- One of my colleagues noted they too assigned the principles to responsible parties but have a different cycle of review.

Implementation

Using the gathered information, I tweaked one of the principles assignment documents I received from a colleague. I then reviewed all of the principles and assigned each principle to the division I believed was responsible for that principle, for example Academic Affairs or Student Affairs. For some principles I also selected the responsible area within that division when I found it obvious, for example my area Evaluation, Accreditation, and Planning (EAP) is responsible for maintaining the College's mission and thus Principle 2.1 Institutional Mission is assigned to the EAP within the division of Academic Affairs. After having conducted my preliminary assignment of the principles I met with my supervisor, the Senior Vice President for Academic Affairs, with whom I had previously explained my proposal of continuous compliance. We reviewed the principle assignment list and after some adjustments we agreed it was time to take it before the Executive Council (EC). The members of SCC's Executive Council are the President, the Senior Vice President of Academic Affairs, the Vice President of Business Affairs, the Vice President of Student Affairs, the Vice President for Economic Development, the Associate Vice President of Human Resources, and the Executive Director of SCC Foundation.

During my first meeting with the Executive Council I briefed them on the proposal of acquiring and maintaining a state of continuous compliance. We briefly discussed process and the principles' assignment list. Each EC member had been emailed a copy of the SACSCOC Principles of Accreditation Resource Manual. The Principles of Accreditation Resource Manual is "designed to (1) provide guidance to institutions as they seek to identify strategies for documenting compliance with SACSCOC

requirements and standards and (2) be a resource in the training of review committee members and trustees as they strive to apply the *Principles* fairly and consistently,” (*POA Resource Manual*, 2018, p. 1). The EC members were asked to refer to the resource manual when reviewing their assigned principles and determine if they agreed with the assignments. After I received confirmation from all members, they were then assigned the task of determining and selecting the appropriate unit/individual within their area that will be responsible for the principle(s). The results were as follows:

SCC Continuous Compliance Principles of Accreditation			
Principle	Principle Titles	Division	Assignment
	Institutional Summary	Academic Affairs	EAP
Section 1	The Principle of Integrity		
Section 1.1	Integrity	President's Office	
Section 2	Mission		
Section 2.1	Institutional Mission	Academic Affairs	EAP
Section 3	Basic Eligibility Standard		
Section 3.1.a	Degree Granting Authority	Academic Affairs	EAP
Section 3.1.b	Course Work for Degrees	Academic Affairs	EAP
Section 3.1.c	Continuous Operation	Academic Affairs	EAP
Section 4	Governing Board		
Section 4.1.a	Governing Board: Legal Body with Authority	Business Affairs	Business Affairs (BA) President's Office (PO)
Section 4.1.b	Governing Board: Exercises Fiduciary Oversight	Business Affairs	BA/PO
Section 4.1.c	Governing Board: Free of Financial Interest	Business Affairs	BA/PO
Section 4.1.d	Governing Board: Not Controlled by a Minority	Business Affairs	BA/PO
Section 4.1.e	Governing Board: Not Presided Over by the Chief Executive Officer	Business Affairs	BA/PO
Section 4.2.a	Mission Review	Academic Affairs	EAP
Section 4.2.b	Board / Administrative Distinction	Business Affairs	BA/PO
Section 4.2.c	CEO Evaluation / Selection	Human Resources	HR AVP
Section 4.2.d	Conflict of Interest	Business Affairs	BA/PO
Section 4.2.e	Board Dismissal	Business Affairs	BA/PO
Section 4.2.f	External Influence	Business Affairs	BA/PO
Section 4.2.g	Board Self-Evaluation	Academic Affairs	EAP
Section 4.3	Multi-Level Governance	Business Affairs	BA/PO

SCC Continuous Compliance Principles of Accreditation			
Principle	Principle Titles	Division	Assignment
Section 5	Administration and Organization		
Section 5.1	Chief Executive Officer	Human Resources	HR AVP
Section 5.2.a	CEO Control	Human Resources	HR AVP
Section 5.2.b	Control of Intercollegiate Athletics	Not Applicable	
Section 5.2.c	Control of Fund-Raising Activities	Advancement	Foundation
Section 5.3.a	Institution-Related Entities: Legal Authority is Clearly Defined	Business Affairs	BA/PO
Section 5.3.b	Institution-Related Entities: Formal, Written Description of Relationship	Business Affairs	BA/PO
Section 5.3.c	Institution-Related Entities: Control of Fund-raising Activities	Business Affairs	BA/PO
Section 5.4	Qualified Administrative / Academic Officers	Human Resources	HR AVP
Section 5.5	Personnel Appointment and Evaluation	Human Resources	HR AVP
Section 6	Faculty		
Section 6.1	Full-Time Faculty	Academic Affairs	Instruction
Section 6.2.a	Faculty Qualifications	Academic Affairs	Instruction
Section 6.2.b	Program Faculty	Academic Affairs	Instruction
Section 6.2.c	Program Coordination	Academic Affairs	Instruction
Section 6.3	Faculty Appointment and Evaluation	Academic Affairs	HR
Section 6.4	Academic Freedom	Academic Affairs	Instruction
Section 6.5	Faculty Development	Academic Affairs	Instruction
Section 7	Institutional Planning and Effectiveness		
Section 7.1	Institutional Planning	Academic Affairs	EAP
Section 7.2	Quality Enhancement Plan	Academic Affairs	QEP Dir.
Section 7.3	Administrative Effectiveness	Academic Affairs	EAP
Section 8	Student Achievement		
Section 8.1	Student Achievement	Academic Affairs	EAP
Section 8.2.a	Student Outcomes: Educational Programs	Academic Affairs	EAP/Instruction
Section 8.2.b	Student Outcomes: General Education	Academic Affairs	Instruction
Section 8.2.c	Student Outcomes: Academic / Student Services	Academic Affairs Student Affairs	EMR VP Student Affairs
Section 9	Educational Program Structure and Content		
Section 9.1	Program Content	Academic Affairs	Instruction
Section 9.2	Program Length	Academic Affairs	Instruction
Section 9.3.a	General Education Requirements: Coherent Rationale	Academic Affairs	Instruction
Section 9.3.b	General Education Requirements: Substantial Component	Academic Affairs	Instruction
Section 9.3.c	General Education Requirements: Breadth of Knowledge	Academic Affairs	Instruction
Section 9.4	Institutional Credits for Undergraduate Degree	Academic Affairs	Records
Section 9.5	Institutional Credits for Grad/Prof Degree	Not Applicable	
Section 9.6	Post-Baccalaureate Rigor and Curriculum	Not Applicable	
Section 9.7	Program Requirements	Academic Affairs	Instruction
Section 10	Educational Policies, Procedures and Practices		

SCC Continuous Compliance Principles of Accreditation			
Principle	Principle Titles	Division	Assignment
Section 10.1	Academic Policies	Academic Affairs	Sr. VP
Section 10.2	Public Information	Economic Development	Marketing/PR
Section 10.3	Archived Information	Academic Affairs	LRC
Section 10.4	Academic Governance	Academic Affairs	Instruction
Section 10.5	Admissions Policies and Practices	Academic Affairs	EMR
Section 10.6.a	Distance Education: Student Identity Verification	Academic Affairs	SCC Online
Section 10.6.b	Distance Education: Protecting Student Privacy	Academic Affairs	SCC Online
Section 10.6.c	Distance Education: Additional Charges	Academic Affairs	SCC Online
Section 10.7	Policies for Awarding Credit	Academic Affairs Student Affairs	Records
Section 10.8	Evaluating and Awarding Academic Credit	Academic Affairs Student Affairs	Records
Section 10.9	Cooperative Academic Arrangements	Academic Affairs	NA
Section 11	Library and Learning / Information Resources		
Section 11.1	Library and Learning / Information Resources	Academic Affairs	LR/EMR
Section 11.2	Library and Learning / Information Staff	Academic Affairs	LR/EMR
Section 11.3	Library and Learning / Information Access	Academic Affairs	LR/EMR
Section 12	Academic and Student Support Services		
Section 12.1	Student Support Services	Student Affairs	VP Student Affairs EMR
Section 12.2	Student Support Services Staff	Student Affairs	VP Student Affairs EMR
Section 12.3	Student Rights	Student Affairs	VP Student Affairs
Section 12.4	Student Complaints	Student Affairs	VP Student Affairs
Section 12.5	Student Records	Student Affairs	Records
Section 12.6	Student Debt	Student Affairs	Financial Aid
Section 13	Financial and Physical Resources		
Section 13.1	Financial Resources	Business Affairs	Business Affairs (BA) Business Office (BO)
Section 13.2.a	Financial Documents: Institutional Audit	Business Affairs	BA/BO
Section 13.2.b	Financial Documents: Position of Unrestricted Net Assets	Business Affairs	BA/BO
Section 13.2.c	Financial Documents: Annual Budget	Business Affairs	BA/BO
Section 13.3	Financial Responsibility	Business Affairs	BA/BO
Section 13.4	Control of Finances	Business Affairs	BA/BO
Section 13.5	Control of Sponsored Research / External Funds	Business Affairs	Business Affairs Grants
Section 13.6	Federal and State Responsibilities	Business Affairs Student Affairs	Business Affairs Financial Aid
Section 13.7	Physical Resources	Business Affairs	BA/Campus Opns
Section 13.8	Institutional Environment	Business Affairs	BA/Campus Opns
Section 14	Transparency and Institutional Representation		
Section 14.1	Publication of Accreditation Status	Academic Affairs Economic Development	EAP Marketing/PR
Section 14.2	Substantive Change	Academic Affairs	EAP

SCC Continuous Compliance Principles of Accreditationv			
Principle	Principle Titles	Division	Assignment
Section 14.3	Comprehensive Institutional Review	Academic Affairs	Sr VP / EMR
Section 14.4	Representation to Other Agencies	Academic Affairs	EAP / Marketing
Section 14.5	Policy Compliance	Academic Affairs	EAP

As the EC members were assigning their responsible parties, members of the EAP were inputting narrative information from the College's 2016 compliance audit in the Strategic Planning Online (SPOL) accreditation module. SPOL is an "integrated strategic management software package that includes planning, accreditation, assessment, credentialing, and budgeting," (Strategic Planning Online LLC [US], n.d.). The SPOL software contains most, if not all, of the elements used in creating and maintaining an institutional effectiveness plan focused on continuous improvement.

During a second meeting with the EC we:

- Finalized the principles' assignments list.
- Discussed the responsibilities and expectations of those who they had assigned.
- Discussed the responsibilities and expectations of them as approvers.
- Discussed the process and how we will close the loop.

I also informed them that we would be holding a Continuous Compliance Kick-Off with their assignees to inform them of this process, their responsibilities, and to get them started.

The Continuous Compliance Kick-Off was a festive event celebrating acquiring reaffirmation and maintaining accreditation readiness (Staying Ready). There were refreshments and music. The assignees were treated to a presentation that included:

- The importance of reaffirmation and what accreditation signifies for the college.
- Information on the changes to the Principles of Accreditation.
- The College's Fifth-Year Interim Report and decennial reaffirmation timelines.
- The Continuous Compliance process timeline.
- An overview of the Principles of Accreditation Resource Manual.
- Guidelines for writing a narrative.

Following the presentation, there was conversation addressing:

- Roles and responsibilities.
- Providing proof of compliance (documentation).
- Training.
- Closing the loop (reporting out).

Before we adjourned each assignee and designee/assistant, and EC member had the opportunity to sign up for training on reviewing and entering information into the SPOL accreditation module, narrative writing, and collecting and presenting supporting documentation. The EC members were also able to sign up for training on reviewing and approving principles in SPOL.

To date two sessions addressing reviewing and entering/editing information into the SPOL accreditation module have been conducted. Two sessions of how to write the narrative has been completed. One unit has completed the narratives for its two

principles and collected the supporting documentation. That unit is awaiting training on how to input that documentation into SPOL and link it to the narrative. After which, those principles will be ready for review and approval.

Unfortunately, I got ill before Thanksgiving 2019 and was out until January 6, 2020. The illness interrupted my plans for additional training and to have at least 14 of the 24 principles we are required to address during our Fifth-Year Interim Report completed and in the review for approval phase. Through conversation with many of those assigned or assisting someone assigned a principle, they seem eager to learn and get started or move to the next step (or they are just ready to get it over with 😊). This has been a welcomed response. As stated at the beginning of this project, many at the institution hold a view that reaffirmation is over and we don't need to worry about it or have to address until 2025, the year before the next reaffirmation. The willingness of those assigned a standard(s) to learn how to determine and provide evidence that their assigned standards are in compliance has proven to be beyond what I expected. The only costs incurred have been the funds used for the kick-off and the cost for copies of instructions provided at each training session. The SPOL software was purchased prior to the start of this project and it does come with an annual cost; however, the college is committed to that cost for at least the next seven years. This process has the full support of the SCC leadership, and they appear genuinely interested in the status of compliance and are looking forward to reporting out on how well they are doing "Staying Ready."

Evaluation

The ultimate measure of success of this process will happen in 2026 when SACSOC announces at its annual meeting that Spartanburg Community College has been reaffirmed for accreditation with no recommendation. Early evidence of the success and effectiveness of this process will be known after the College's Fifth-Year Interim Report due September 2021 is reviewed by SACSCOC and the results are announced December 2021. Prior to the "official" acknowledgements of success, we will see evidence when the first group of approvals by the compliance committee are given. The anticipated date for those approvals is no later than May 31, 2020. An even greater confirmation will come during the summer semester when the division leaders will give a status of compliance briefing during an Executive Council meeting. All information will be captured in the minutes. I experienced an unexpected consequence of this plan was just this week. Because of our plan to have leaders brief their compliance status annually, it was suggested that we do the same for operational planning. This is evidence of continuous improvement and will result in staying "Compliance Ready."

References

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